

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

VICKY RODRÍGUEZ TORRES, LUIS RAFAEL
MALDONADO VAILLANT, AND THEIR
CONYUGAL PARTNERSHIP

PLAINTIFF,

v.

GOVERNMENT DEVELOPMENT BANK FOR
PUERTO RICO, JAVIER RAMOS LUIÑA,
JANE DOE (1), CONJUGAL PARTNERSHIP
RAMOS-DOE(1), ENID LÓPEZ LÓPEZ, JOHN
DOE (2), CONJUGAL PARTNERSHIP LÓPEZ-
DOE (2), ÁNGEL PÉREZ RIVERA, JANE DOE
(3), CONJUGAL PARTNERSHIP PÉREZ-DOE(3),
JORGE IRIZARRY HERRANS, JANE DOE (4),
CONJUGAL PARTNERSHIP IRIZARRY-DOE (4),
LUIS I. ALFARO MARTÍNEZ, JANE DOE (5),
CONJUGAL PARTNERSHIP ALFARO-DOE (5),
MARINE COMAS TORRES, JOHN DOE (6),
CONJUGAL PARTNERSHIP COMAS-DOE (6),
NAPHIS TORRES PADRÓ, JOHN DOE (7),
CONJUGAL PARTNERSHIP TORRES-DOE (7),
EDGARDO RODRÍGUEZ NIEVES, JANE DOE (8),
CONJUGAL PARTNERSHIP RODRÍGUEZ-DOE (8),
AND ABC INSURANCE
DEFENDANTS.

CIVIL NO. 09-CV-01151-JP

SUBJECT MATTER: TITLE
VII VIOLATIONS, AGE &
SEX DISCRIMINATION,
TORTS

PLAINTIFF DEMANDS TRIAL
BY JURY

PLAINTIFF'S MOTION WITH REFERENCE TO ISC ORDER OF JUN 29, 2009

TO THE HONORABLE COURT:

Plaintiff VICKY RODRÍGUEZ TORRES, LUIS RAFAEL MALDONADO
VAILLANT, AND THEIR CONYUGAL PARTNERSHIP (hereinafter,
Plaintiffs), through the undersigned attorneys, respectfully and
in compliance with this Courts Initial Scheduling Conference
Order STATE and PRAY as follows:

1. The Initial Scheduling Conference ("ISC") was held on
June 29, 2009 before the Honorable Judge Jaime Pieras, Jr.

2. The Court notified on July 14, 2009 the Initial Scheduling Conference Order ("ISC Order").

3. The ISC Order states in Part V. Preliminary Orders, page 11, that:

"Defendants informed the Court that they already served interrogatories and requests for admissions upon Plaintiffs. Plaintiffs **SHALL** answer **on or before July 13, 2009.**"

4. The subscribing attorney's notes of the Initial Scheduling Conference do not reflect that the period for Plaintiff to answer Defendant's Interrogatories, Request for Documents and Requests for Admissions had been shortened to twenty (20) days, ending on July 13, 2009.

5. Defendant notified Plaintiff their *First Set of Interrogatories, Request for Production of Documents and Request for Admissions* on June 23, 2009.

6. Consequently, Plaintiff had until July 23, 2009 to notify Defendants their answers.

7. Plaintiff inform that the Document production requested by Defendants has was essentially provided in compliance with the ISC Order of this Court.

8. The only documents not previously provided, are those related to Plaintiff's university education and academic record, which we being provided today, July 15, 2009.

9. Copy of these documents are already in Defendants custody, and were produced by Defendants in compliance of the Courts ISC order as part of Plaintiff's employee file.

10. Plaintiffs will notify today, July 15, 2009 their responses to the Request for Admissions.

WHEREFORE based on the foregoing Plaintiffs respectfully request the Court's forbearance for this misunderstanding, and inform that Plaintiffs will comply forthwith with the Court's ISC Order.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **Mariela Rexach Rexach**, P. O. Box 363128, San Juan, Puerto Rico 00936-3128.

In San Juan, Puerto Rico, this fifteen (15) day of July of 2009.

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Signed By: ***Olga M. Benítez Quiñones***
Olga María Benítez Quiñones
USDC-PR No. 226502